

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04cv30215-KPN

BRIAN JONES,)
Plaintiff,)
vs.)
THE URGAN LEAGUE OF)
SPRINGFIELD, INC. AND CAMP)
ATWATER,)
Defendants.)
)
)

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AFFIDAVIT OF ROBERT L. LEONARD

Robert L. Leonard, being duly sworn states:

1. I am an attorney licensed in Massachusetts and admitted to practice before this court. I represent the defendant in this action.
2. On November 2, 2005, I deposed Brian Jones, the plaintiff in this action. Although I have not yet received the transcript of that deposition, it is my memory that Mr. Jones testified to the following:
 - a. He graduated from Putnam Vocational Technical High School in Springfield during June, 2003.
 - b. He worked at Camp Atwater for the defendant within a few weeks after his graduation. He was employed for approximately one week.
 - c. Two or more of the other temporary workers who allegedly witnessed Mr. Jones being sexually harassed were his high school classmates or were in the high school with him at the same time although members of another class. He only admitted he was friendly with one of them.
 - d. Mr. Jones was suspended from high school more than once but could not remember how many times. Mr. Jones also testified he could not remember why he was suspended on any of those occasions.

e. Mr. Jones testified he felt sexually harassed when, while working in the kitchen of the camp, the chef talked about his desires for sexual relationships with female employees of the camp, when the chef called him a "little bitch" on one occasion and, on another occasion, when the plaintiff asked him to pass the napkins, the chef gestured toward his own genitals and said the plaintiff should try "these napkins."

The above information is correct to the best of my knowledge and belief.



Robert L. Leonard
Dated: November 3, 2005